

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 12-cr-189 (WEC)

JESSICA TALSKY,

Defendant.

MOTION FOR RECONSIDERATION OF BOND

Jessica Talsky, through counsel, moves this court for an order reinstating her prior conditions of bond. In support, she states the following:

1. Ms. Talsky is a defendant in a multi-defendant drug conspiracy that was charged in August 2012.
2. On August 30, 2012, Ms. Talsky was released with conditions of bond.
3. On February 28, 2013 Ms. Talsky appeared before this Court to address issues concerning her bond. At that time her bond was not revoked, but she was admonished that future violations could result in the revocation of her bond.
4. On August 20, 2013, counsel filed a motion with this Court seeking

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travel authorization. Hearings took place on September 5 and 10, 2013 to address a positive drug test result. The travel motion was ultimately withdrawn, and Ms. Talsky was released with the understanding that any additional violations would result in her immediate revocation.

5. On September 25, 2013, Ms. Talsky was issued a citation for allegedly stealing personal use items (i.e. shampoo, band aids, soap).

6. Since the new activity was a new violation of her pre-trial release conditions, Ms. Talsky turned herself in to the United States Marshal Service on October 4, 2013. She has been in custody since that time.

7. Ms. Talsky's incarceration presents an extreme hardship for her family. She is the primary caretaker of two minor children. The father of the oldest one is incarcerated, and the father of the younger one is a co-defendant on the instant case. Moreover, his family situation does not allow him to assume custody of their child. The children are currently under the care of her mother who has her own medical concerns to focus on in addition to the children.

8. The treatment provider that provided services for Ms. Talsky has been in touch with counsel and confirmed that Ms. Talsky can immediately resume programming upon her release.

9. We request that this Court release Ms. Talsky with the previously

imposed conditions of bond with the understanding that she is to strictly comply with all of the conditions.

9. Counsel has spoken with USPO Alicia Jones. She supports Ms. Talsky's release from custody so long as Ms. Talsky understands that she must strictly comply with all of the conditions of bond and no further violations will be tolerated.

10. Counsel has spoken to AUSA Erica O'Neil. She has no objection to Ms. Talsky's release.

Based on the above, counsel moves for an order reinstating the previously ordered conditions of bond for Ms. Talsky.

Dated at Milwaukee, Wisconsin this 28th day of October 2013.

Respectfully submitted,

/s/ Juval O. Scott
Juval O. Scott, IN Bar #23741-49
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